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January 7, 2025

**VIA ECF**

The Hon. Jesse M. Furman  
 United States District Court for the Southern District of New York  
 Thurgood Marshall United States Courthouse  
 40 Foley Square  
 New York, New York 10007

**Re: Frommer et al. v. MoneyLion Techs. Inc. et al., No. 23-cv-06339 (JMF)**

Dear Judge Furman:

Plaintiffs submit this letter requesting leave to file under seal (i) Plaintiffs' Response to MoneyLion's Proposed Findings of Fact and Conclusions of Law; (ii) Plaintiffs' Memorandum of Law in Opposition to MoneyLion's Motions to Exclude Sellers' Proposed Experts and (iii) Exhibit 6 to the accompanying Declaration of Nathaniel Ament-Stone; and (iv) Plaintiffs' Evidentiary Objections to MoneyLion's Trial Affidavits, pursuant to Your Honor's Individual Practice 7.C.iii.

Plaintiffs are taking this step solely at MoneyLion's request, because these documents contain quotations from the trial affidavits of its fact witnesses, which MoneyLion has requested be kept confidential. Plaintiffs take no position on whether this material should remain confidential.

Respectfully submitted,

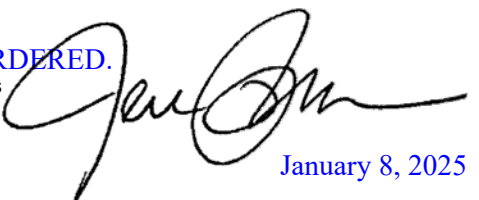
/s/ Nathaniel Ament-Stone  
 Nathaniel Ament-Stone

Cc: All counsel of record

The motion to seal is granted temporarily. That said, mere agreement between the parties to keep a document confidential is not sufficient to keep a "judicial document" sealed or redacted. *See, e.g., United States v. Wells Fargo Bank N.A.*, No. 12-CV-7527 (JMF), 2015 WL 3999074, at \*4 (S.D.N.Y. June 30, 2015) (citing cases). Thus, if any party believes that the materials at issue should remain sealed or redacted, that party shall file a letter brief, within three days and not to exceed three pages, showing why doing so is consistent with the presumption in favor of public access to judicial documents. *See generally Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006).

The Clerk of Court is directed to terminate ECF No. 150.

**SO ORDERED.**



January 8, 2025